

## **EXHIBIT 4**

Greg Looney

HIGHLY CONFIDENTIAL  
Wilmington, Delaware

May 12, 2005

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS  
3

4 In Re: PHARMACEUTICAL : MDL DOCKET NO.  
5 INDUSTRY AVERAGE WHOLESALE : CIVIL ACTION #  
6 : 01CV12257-PBS  
7 :  
8 PRICE LITIGATION : HIGHLY CONFIDENTIAL

9 -----  
10 THIS DOCUMENT RELATES TO:  
11 -----  
12 ALL ACTIONS  
13 -----

**CERTIFIED COPY**

14 VOLUME I - Pages 1 to 152  
15

16 RULE 30(b) (6) deposition of ASTRAZENECA,  
17 by and through its corporate designee, GREG LOONEY,  
18 taken pursuant to notice at the law offices of Morris,  
19 Nichols, Arsh & Tunnell, 1201 North Market Street,  
20 18th Floor, Wilmington, Delaware, beginning at 9:30  
21 a.m., on Thursday, May 12, 2005, before Julie H.  
22 Parrack, Registered Merit Reporter, Certified Realtime  
Reporter and Notary Public, there being present:  
23 -----  
24  
25

Greg Looney

HIGHLY CONFIDENTIAL  
Wilmington, Delaware

May 12, 2005

5

1 A. Yes.

2 Q. Can you trace your employment history with its  
3 predecessors from the beginning?

4 A. Sure. In 1992 I started with the former  
5 Astra/Merck, which was a division of Merck & Company  
6 at the time. And I don't know the exact date, but  
7 sometime in the late '90s, Astra/Merck became wholly  
8 owned by Astra Pharmaceuticals. And then the merger  
9 with Zeneca and Astra in 1999 resulted in AstraZeneca,  
10 and I was there throughout that entire time period.

11 Q. And what was your position, your first position  
12 with Astra/Merck?

13 A. Business Manager.

14 Q. What were your responsibilities?

15 A. I was responsible for managing the finances of  
16 the region, doing analytics within the region, and I  
17 also was responsible for calling on some key accounts  
18 within the region, and negotiating managed care  
19 contracts with regional accounts, managed care  
20 accounts within the region were the primary  
21 responsibilities, among other things.

22 Q. How long were you business manager?

## **EXHIBIT 5**

James F. Liebman

Highly Confidential  
Wilmington, DE

February 11, 2005

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS

# **CERTIFIED COPY**

In Re: PHARMACEUTICAL : MDL DOCKET NO.  
INDUSTRY AVERAGE WHOLESALE : CIVIL ACTION #  
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James F. Liebman

Highly Confidential

February 11, 2005

Wilmington, DE

7

1 BY MS. FEGAN:

2 Q. Good morning, Mr. Liebman.

3 A. Hi, how are you?

4 Q. My name is Beth Fegan. I represent the plaintiffs in  
5 this case.

6 Could you tell me where you live?

7 A. I live in St. Louis, Missouri.

8 Q. How long have you lived there?

9 A. Fifty-eight years.

10 Q. Who are you employed by?

11 A. AstraZeneca.

12 Q. How long have you been employed by AstraZeneca?

13 A. Thirty-four years.

14 Q. Could you tell me about your education from college  
15 on?

16 A. I have a BS in education. That's from Southeast  
17 Missouri, and I then went into the Army for two years, and  
18 then joined what was then Stuart Pharmaceuticals.

19 Q. What was your first position at Stuart  
20 Pharmaceuticals? And what year was that?

21 A. 1971. I was a sales representative.

22 Q. What were your responsibilities as sales

## EXHIBIT 6

Alan J. Milbauer

Highly Confidential  
Wilmington, DE

October 27, 2004

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS

4 In Re: PHARMACEUTICAL : MDL DOCKET NO.  
5 INDUSTRY AVERAGE WHOLESALE : CIVIL ACTION #  
PRICE LITIGATION : 01CV12257-PBS  
5 : HIGHLY CONFIDENTIAL

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COPY**

## ALL ACTIONS

Alan J. Milbauer

Highly Confidential  
Wilmington, DE

October 27, 2004

13

1 A. Sorbitrate.

2 Q. Sorbitrate?

3 A. Yeah, S-O-R-B-I-T-R-A-T-E.

4 Q. Is Atlas Chemical Industries still in existence  
5 today?

6 A. No.

7 Q. Did it go out of business or was it bought out?

8 A. It was bought.

9 Q. Who bought it?

10 A. ICI.

11 Q. When?

12 A. 1971.

13 Q. And you went to work for ICI?

14 A. Yes. I retained -- I remained working for the  
15 company.

16 Q. So I understand, did it become an Atlas Chemical  
17 Industries division of ICI or was it merged into ICI?

18 A. It was acquired and I think the name Atlas  
19 Chemical went away. My recollection, it may have been --  
20 one of the divisions may have still retained like Atlas  
21 Powder or something. But it became ICI.

22 Q. Did ICI buy Atlas in its entirety?